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# City of Phoenix

POLICE DEPARTMENT

24 May 1993

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Ms. Donna Searcy  
Secretary  
Federal Communications Commission  
1919 M Street NW, Room 222  
Washington, D.C. 20554

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MAY 26 1993

Re: PR Docket No. 92-235

FCC MAIL BRANCH

Dear Ms. Searcy:

Our communications staff has reviewed the subject Notice of Proposed Rule Making and would like to submit the following comments. The proposal, and the new Part 88, are written with the best intentions but the implementation schedule is too aggressive for an unproven technology. We share your goal of obtaining more efficient use of the spectrum, but the proposal and timetable will create an impossible hardship on the operation of this Department. Please allow us to share our concerns as a part of the hearing process.

## ECONOMIC IMPACT

To accomplish our mission of delivering law enforcement services and protection to the citizens of Phoenix requires twenty channels of two-way radio. Our current inventory of mobile and portable radios totals 4526, in a mixture of VHF and UHF. This split-band operation creates administrative complexity but is necessary to obtain the total number of channels required for Investigative and Patrol services. Some officers are required to carry two radios to stay informed and to have access to dispatchers. Departmental strength is approximately 2200 sworn personnel and 1320 vehicles.

Given an uncertain economy and the size of our inventory our concern is readily apparent. Much of our radio communication equipment is new within the last 2-3 years, and because of quality control and technological improvements it is far from replacement. The impact of narrowbanding and increased selectivity to remain in operation on the current channels is overwhelming. The two voice encryption systems that are marginal at full bandwidth would become totally useless with narrower deviation. Replacement of these systems was not anticipated until around 2001-02. Please make provision to incorporate this timetable in your final rulemaking.

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#### FIXED EQUIPMENT

The irregular mountainous terrain of this city has created some safety issues for officers in the field. To overcome these limitations an elaborate voting receiver network has been installed that covers the 449 sq.mi. incorporated area of the City of Phoenix. This represents an infrastructure of 310 receivers and eighty transmitters and control stations. Adoption of the rule change as proposed would nearly double our number of transmitter sites to deliver usable ERP to field radios. The proposed ERP reduction fails to take account of such problems that are not exceptional cases in Phoenix.

We support the Arizona APCO proposal as written, but especially in the substitution of RF signal strength contours over ERP calculations. Consider the impact of reducing a 350 W ERP together with reduced deviation on already marginal talk-out coverage to high density housing or remote desert areas. Please adopt an "area of required coverage RF contour" as a substitute. Local jurisdiction by a body such as APCO with FCC concurrence would protect and allow reuse of limited spectrum with such a plan.

#### FUTURE PLANS

The City of Phoenix recently completed a consultant study of our radio communication needs. In summary, that study recommends migration to 800MHz trunking. The plan would include transparent systems for municipal services and public safety, and would integrate all area public safety agencies for joint operations.

2) Any expansion of channels identified by refarming should be retained within that service group and administered through a frequency coordination body. Distinctions and exclusions given in the footnotes should remain, allowing at least as much discretion as currently exists. It is not possible to establish an all-encompassing set of regulations to meet every need. Distributed hierarchy, such as State administered APCO, should remain in place to adjudicate special coverage needs with recommendations to the Commission.

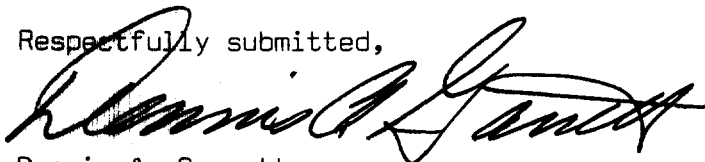
3) Preferential treatment should not be established in the creation of a new set of SMRs coincident with the RBOC boundaries. Public safety should neither be encouraged, nor forced to abandon self-administered, private dispatch operation. Frequency sharing from a pool should still maintain an identity for a certain user group and administration. Erasing all unique features of channel assignments and user boundaries will create an inter-modulation nightmare, even at reduced power levels.

4) The proposed reduction in ERP levels assumes optimistic propagation, while in reality the higher power levels are required to fill canyons and valleys through knife-edge diffraction. "Refarmed" coverage should not be reduced from present coverage in the case of demonstrated need and should not become a burdensome matter of proof to retain. Trust and experience should prevail in cases regarding current systems.

5) Any plan should consider interoperability, migration and the protection of VHF repeater pairs for public safety. Exclusive Use Overlays and the current 70 mile co-channel proviso should be retained with a block allocation for public safety licensees.

Activities leading to more efficient use of the spectrum must be governed by economic and technological realities. This is especially true in Public Safety, where we are faced with an ever increasing demand for services and a continuous reduction in funding. Please include these concerns in your decision process on this Notice of Proposed Rule Making.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Dennis A. Garrett", written over the typed name below.

Dennis A. Garrett  
Police Chief